

# EXHIBIT D

1 MICHAEL WARD (SBN 146484)  
michael.ward@bakerbotts.com  
2 JACK R. BOOTH (SBN 347887)  
jack.booth@bakerbotts.com  
3 **BAKER BOTTS LLP**  
1001 Page Mill Road, Suite 200  
4 Palo Alto, CA 94304  
Phone: 650-739-7538  
5 Fax: 650-739-7638

6 KARAN SINGH DHADIALLA (SBN 296313)  
karan.dhadialla@bakerbotts.com  
7 **BAKER BOTTS LLP**  
101 California Street, Suite 3200  
8 San Francisco, CA 94111  
Phone: 415-291-9203  
9 Fax: 415-291-6303

10 *Attorneys for Respondent Arturo Bejar*  
11

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN JOSE DIVISION**  
15

16 IN RE: SOCIAL MEDIA ADOLESCENT  
17 ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

18 THIS DOCUMENT RELATES TO:  
19 *All Actions*  
20

Case No. 4:22:MD-03047-YGR

MDL No. 3047

**NON-PARTY RESPONDENT ARTURO  
BEJAR'S RESPONSES AND  
OBJECTIONS TO DOCUMENT  
PRODUCTION SUBPOENA**

1 Non-party Respondent Arturo Bejar (“Mr. Bejar” or “Respondent”), hereby responds to the  
2 Subpoena to Produce Documents (“Subpoena”) issued by Defendant Meta Platforms, Inc., et al.  
3 (“Meta” or “Petitioner”) pursuant to and Fed. R. Civ. P. 45(d-e).

4 **PRELIMINARY STATEMENT**

5 Without in any way waiving or limiting his objections, Mr. Bejar has attempted in good faith  
6 to provide responses to the Subpoena (“Responses”) to the extent reasonably practicable and based  
7 upon information reasonably known to him. These Responses are based upon information that is  
8 presently available to Mr. Bejar and his attorneys. Mr. Bejar’s counsel has met and conferred with  
9 Meta’s counsel regarding the scope of these Requests, and—in connection with Meta’s counsel, agreed  
10 to an extension of time for Mr. Bejar to both provide a written response to the subpoena and to produce  
11 documents in response to the subpoena—Mr. Bejar’s counsel shared his primary objections to this  
12 subpoena with Meta’s counsel during both the meet and confer and through email. Mr. Bejar also  
13 committed to the production of substantive, responsive documents, not subject to the objections stated  
14 herein and has separately conveyed the categories of documents to be produced pursuant to this  
15 commitment to Meta’s counsel. While Meta and Mr. Bejar have not yet agreed to a specific date for  
16 the production of documents, Mr. Bejar’s counsel intends to produce much of these documents shortly  
17 after service of these Responses and Objections.

18 No incidental or implied admissions are intended by these responses. Nothing contained  
19 herein, and no production of documents in response to the production requests (each a “Request” and  
20 together the “Requests”) should be construed as an admission by Mr. Bejar regarding the admissibility,  
21 relevance, or materiality of any fact or document, or the truth or accuracy of any characterization or  
22 statement of any kind contained in the Requests.

23 The General Objections set forth below are intended to apply to all information produced or  
24 provided pursuant to the Subpoena. Furthermore, these Responses, the concurrent production, and  
25 future productions do not waive any objections by Mr. Bejar, in this or any subsequent proceeding,  
26 on any ground, including objections as to competency, authenticity, relevancy, materiality, privilege,  
27 admissibility of the responses, documents, or subject matter thereof.

**GENERAL OBJECTIONS TO DOCUMENT REQUESTS  
AND DEPOSITION TOPICS**

Respondent, Mr. Bejar, makes the following General Objections to the Subpoena and each Request in the Subpoena regardless of whether the General Objections and responses are specifically incorporated into the specific objections and responses below:

1. Respondent objects to all requests insofar as they are overbroad and not proportional to the needs of the underlying action pursuant to FRCP 26(b)—particularly in the context of documents being sought from a non-party to the litigation. Respondent is a subject matter expert and regularly advises and advocates on the topics of technology, social media, and youth safety. Insofar as any Request asks Mr. Bejar to produce his extensive work and communications on these topics—without being necessarily calibrated to the needs of the Petitioner for its defenses in the case—that Request is overbroad.
2. Respondent objects to all Requests as being unduly burdensome and should be limited pursuant to FRCP 26(b)(C)(i) and (ii)—particularly in the context of documents being sought from a non-party to the litigation that could have been obtained more conveniently from other sources earlier in this litigation. Meta has been on notice of the likelihood of Mr. Bejar’s deposition since this action began. Meta was fully capable of providing Mr. Bejar ample time to respond to the Requests, but instead chose to issue the Requests three weeks prior to his deposition. Meta is surely aware of the burden imposed on Mr. Bejar by requiring him to search for an expansive universe of documents stretching back to 2012 just weeks before his deposition.

**OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

Mr. Bejar’s failure to specifically object to any Definition shall not be construed as an admission that the Definition is proper and/or in accordance with local rules and practices, nor shall it be construed as an admission that Mr. Bejar understands and/or agrees with any interpretation afforded to that Definition by Meta. To the extent Mr. Bejar agrees to provide discovery in response to the Requests, Mr. Bejar will do so in accordance with its understanding of the Requests and the scope of discovery that counsel for Mr. Bejar and counsel for Meta discussed during their meet and confers.

Respondent's failure to specifically object to any instruction shall not be construed as an admission that the instruction is proper and/or in accordance with local rules and practices, nor shall it be construed as an admission that Respondent understands and/or agrees with the instruction. To the extent Respondent agrees to provide discovery in response to the Subpoena, Respondent will do so in accordance with the requirements set forth per the Fed. R. Civ. P. 45(e).

Without waiver of the foregoing, Respondent objects to the following specific definitions and instructions:

1. Respondent objects to the definition of the term "Relating" or "related to" insofar as it is used to expand requests beyond the needs of the parties for the discoverable scope of the present action. Respondent is active in his advocacy for youth well-being related to technology. Therefore, not every document or communication "referencing, mentioning" etc. the general subject matter of this action will be relevant to the claims and defenses of the action.

1. Respondent does not waive any objection with respect to privilege, but does intend to make his production in conformance with the terms agreed when Counsel for Respondent and Meta met and conferred, which does not require Mr. Bejar to log any correspondence with any attorney at Baker Botts LLP. Further, Respondent objects to the extent that the instructions would require Mr. Bejar to provide information that Mr. Bejar's counsel and Meta's counsel have agreed Mr. Bejar does not need to provide (i.e., communications between Mr. Bejar and Baker Botts L.L.P.).

3. Respondent objects to Instruction Number 20's time period for responsive documents as overbroad and unduly burdensome.

## **RESPONSES AND OBJECTIONS TO DOCUMENT REQUESTS**

### **REQUEST NO. 1**

All Documents and Communications Relating to Your employment at Meta, including but not limited to documents relating to any work you conducted during your employment.

### **RESPONSE TO REQUEST NO. 1**

Respondent objects to this Request as overbroad, unduly burdensome and not proportional to the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from a non-party to the action. Respondent further objects that the Request is vague and ambiguous in

1 seeking “Documents and Communications Relating to Your employment at Meta.” Respondent  
 2 further objects that this Request is overbroad and unduly burdensome in that it is not limited in time.  
 3 These overbroad Requests to a non-party are not clearly related to any defense or claim by Meta—nor  
 4 has the connection been explained by Meta.

5 Subject to these objections, Respondent will produce non-privileged documents related to Mr.  
 6 Bejar’s hiring, performance, and separation from Meta and/or the Instagram Review Board..

## 7 **REQUEST NO. 2**

8 All Documents and Communications with current and/or former Meta employees, regarding  
 9 Social Media Platforms and the mental, social, emotional, or behavioral health, safety, or the sexual  
 10 exploitation of persons under the age of 18.

## 11 **RESPONSE TO REQUEST NO. 2**

12 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
 13 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
 14 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
 15 defense or claim by Meta—nor has the connection been explained by Meta.

16 Respondent objects to this Request on the basis that it amounts to harassing protected  
 17 whistleblower activity—including, but not limited to, identifying and divulging efforts to assist Mr.  
 18 Bejar in his testimony and compliance with investigative subpoenas from governmental bodies and  
 19 agencies—protected by both California Labor Code section 1102.5(b)(d) and 18 U.S.C.A. 1514A.  
 20 Respondent also objects to this Request as burdensome, harassing, and violating free-speech  
 21 protections of individuals in their association and assistance with his efforts in testifying and  
 22 advocating against the dangers to youth posed by social media. *See Chevron Corp v. Donzinger*, No.  
 23 13-mc-80038 CRB (NC), 2013 WL 1402727 (N.D. Cal. Apr. 5, 2013); *see also Awtry v. Glassdoor,*  
 24 *Inc.*, No. 16-mc-80028-JCS, 2016 WL 1275566 (N.D. Cal. April 1, 2016).

25 Respondent further objects that the Request is vague and ambiguous in seeking “All  
 26 Documents and Communications...regarding Social Media Platforms and the mental, social,  
 27 emotional, or behavioral health, safety, or the sexual exploitation of persons under the age of 18.”  
 28 Respondent further objects that this Request is overbroad and unduly burdensome in that it is not

1 limited in time.

2 **REQUEST NO. 3**

3 All Documents and Communications concerning Your November 7, 2023 written and oral  
4 testimony before the United States Senate Committee on the Judiciary, Subcommittee on Privacy,  
5 Technology, and the Law Including, but not limited to Communications about preparing such  
6 testimony and interviews regarding such testimony.

7 **RESPONSE TO REQUEST NO. 3**

8 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
9 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
10 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
11 defense or claim by Meta—nor has the connection been explained by Meta.

12 Respondent objects to this Request on the basis that it amounts to harassing protected  
13 whistleblower activity—including, but not limited to, identifying and divulging efforts to assist Mr.  
14 Bejar in his testimony and compliance with investigative subpoenas from governmental bodies and  
15 agencies—protected by both California Labor Code section 1102.5(b)(d) and 18 U.S.C.A. 1514A.  
16 Respondent also objects to this Request as burdensome, harassing, and violating free-speech  
17 protections of individuals in their association and assistance with his efforts in testifying and  
18 advocating against the dangers to youth posed by social media.

19 Respondent further objects that the Request is vague and ambiguous in seeking “Documents  
20 and Communications concerning Your November 7, 2023 written and oral testimony.” Respondent  
21 further objects that this Request is overbroad and unduly burdensome in that it is not limited in time.

22 Subject to and without waiving the foregoing objections, and understanding that Meta has  
23 withdrawn this Request, Respondent will still produce non-privileged documents produced to the  
24 United States Senate Judiciary Committee, as communicated to Meta’s counsel.

25 **REQUEST NO. 4**

26 All Documents and Communications with or Relating to Your meetings with Congress and  
27 Congressional staffers.  
28

**RESPONSE TO REQUEST NO. 4**

Respondent objects to this Request as overbroad, unduly burdensome and not proportional to the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from a non-party to the action. These overbroad Requests to a non-party are not clearly related to any defense or claim by Meta—nor has the connection been explained by Meta.

Respondent objects to this Request on the basis that it amounts to harassing protected whistleblower activity—including, but not limited to, identifying and divulging efforts to assist Mr. Bejar in his testimony and compliance with investigative subpoenas from governmental bodies and agencies—protected by both California Labor Code section 1102.5(b)(d) and 18 U.S.C.A. 1514A. Respondent also objects to this Request as burdensome, harassing, and violating free-speech protections of individuals in their association and assistance with his efforts in testifying and advocating against the dangers to youth posed by social media.

Respondent further objects that the Request is vague and ambiguous in seeking “Documents and Communications with or Relating to Your meetings.” Respondent further objects that this Request is overbroad and unduly burdensome in that it is not limited in time.

Subject to and without waiving the foregoing objections, and understanding that Meta has withdrawn this Request, Respondent will still produce non-privileged documents produced to the United States Senate Judiciary Committee, as communicated to Meta’s Counsel.

**REQUEST NO. 5**

All Documents and Communications between You and any reporter, journalist and/or editor associated with any periodical or other media platform, including but not limited to communications with Jeff Horwitz of the Wall Street Journal, concerning Social Media Platforms and the mental, social, emotional, or behavioral health, safety, or the sexual exploitation of persons under the age of 18.

**RESPONSE TO REQUEST NO. 5**

Respondent objects to this Request as it seeks records of journalists—protected by the California Constitution (Article 1 Sec 2(b)) and Evidence Code Section 1070— through a third party without complying with the notice requirement of Cal. Code Civ. Proc., § 1986.1(b)(2).

Respondent further objects to this Request as overbroad, unduly burdensome and not



1 proportional to the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking  
2 documents from a non-party to the action. These overbroad Requests to a non-party are not clearly  
3 related to any defense or claim by Meta—nor has the connection been explained by Meta. Moreover,  
4 because the final product of these communications—i.e. the articles themselves—are publicly  
5 available and speak for themselves, Meta has not shown a justification for this added burden of  
6 production placed on Respondent through this Request.

7 Respondent further objects that the Request is vague and ambiguous in seeking “All  
8 Documents and Communications between You and any reporter, journalist and/or editor associated  
9 with any periodical or other media platform.... concerning Social Media Platforms and the mental,  
10 social, emotional, or behavioral health, safety, or the sexual exploitation of persons under the age of  
11 18” Respondent further objects that this Request is overbroad and unduly burdensome in that it is not  
12 limited in time.

### 13 **REQUEST NO. 6**

14 All Documents and Communications related to Your participation in the November 2, 2023  
15 article titled, “His Job Was to Make Instagram Safe for Teens. His 14-Year-Old Showed Him What  
16 the App Was Really Like” by Jeff Horwitz in the Wall Street Journal.

### 17 **RESPONSE TO REQUEST NO. 6**

18 Respondent objects to this Request as it seeks records of journalists—protected by the  
19 California Constitution (Article 1 Sec 2(b)) and Evidence Code Section 1070— through a third party  
20 without complying with the notice requirement of Cal. Code Civ. Proc., § 1986.1(b)(2).

21 Respondent further objects to this Request as overbroad, unduly burdensome and not  
22 proportional to the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking  
23 documents from a non-party to the action. These overbroad Requests to a non-party are not clearly  
24 related to any defense or claim by Meta—nor has the connection been explained by Meta. Moreover,  
25 because the final product of these communications—i.e. the articles themselves—are publicly  
26 available and speak for themselves, Meta has not shown a justification for this added burden of  
27 production placed on Respondent through this Request.

28 Respondent further objects that the Request is vague and ambiguous in seeking “All

1 Documents and Communications related to Your participation.” Respondent further objects that this  
2 Request is overbroad and unduly burdensome in that it is not limited in time.

3 **REQUEST NO. 7**

4 All Documents and Communications related to Your participation in creation of the  
5 document “We must make social media safe for teens,” available at  
6 [https://docs.google.com/document/d/1ThE0WaaSGUtepXvW6iXmKersjxmsc-](https://docs.google.com/document/d/1ThE0WaaSGUtepXvW6iXmKersjxmsc-hAHfyDvB02YLI/edit?usp=sharing)  
7 [hAHfyDvB02YLI/edit?usp=sharing](https://docs.google.com/document/d/1ThE0WaaSGUtepXvW6iXmKersjxmsc-hAHfyDvB02YLI/edit?usp=sharing), as cited on <https://www.arturobejar.org>.

8 **RESPONSE TO REQUEST NO. 7**

9 Respondent objects to this Request as it seeks records of journalists—protected by the  
10 California Constitution (Article 1 Sec 2(b)) and Evidence Code Section 1070— through a third party  
11 without complying with the notice requirement of Cal. Code Civ. Proc., § 1986.1(b)(2).

12 Respondent further objects to this Request as overbroad, unduly burdensome and not  
13 proportional to the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking  
14 documents from a non-party to the action. These overbroad Requests to a non-party are not clearly  
15 related to any defense or claim by Meta—nor has the connection been explained by Meta. Moreover,  
16 because the final product of these communications—i.e. the document itself—is publicly available  
17 and speaks for itself, Meta has not shown a justification for this added burden of production placed on  
18 Respondent through this Request.

19 Respondent further objects that the Request is vague and ambiguous in seeking “All  
20 Documents and Communications related to Your participation.” Respondent further objects that this  
21 Request is overbroad and unduly burdensome in that it is not limited in time.

22 **REQUEST NO. 8**

23 All Documents and Communications related to Your participation in the January 15, 2025  
24 article titled, “Freedom From Harassment and Exploitation on Social Media, but Not for Girls” by  
25 Jessica Grose in the New York Times.

26 **RESPONSE TO REQUEST NO. 8**

27 Respondent objects to this Request as it seeks records of journalists—protected by the  
28 California Constitution (Article 1 Sec 2(b)) and Evidence Code Section 1070— through a third party

1 without complying with the notice requirement of Cal. Code Civ. Proc., § 1986.1(b)(2).

2 Respondent further objects to this Request as overbroad, unduly burdensome and not  
3 proportional to the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking  
4 documents from a non-party to the action. These overbroad Requests to a non-party are not clearly  
5 related to any defense or claim by Meta—nor has the connection been explained by Meta. Moreover,  
6 because the final product of these communications—i.e. the article itself—is publicly available and  
7 speaks for itself, Meta has not shown a justification for this added burden of production placed on  
8 Respondent through this Request.

9 Respondent further objects that the Request is vague and ambiguous in seeking “All  
10 Documents and Communications related to Your participation.” Respondent further objects that this  
11 Request is overbroad and unduly burdensome in that it is not limited in time.

12 **REQUEST NO. 9**

13 All Documents and Communications related to the development of  
14 <https://www.arturobejar.org/> insofar as the Documents and Communications also relate to the use of  
15 Social Media Platforms by, safety of, or the sexual exploitation of persons under the age of 18,  
16 Including, but not limited to emails, text messages, messages on chat Platforms (e.g., WhatsApp,  
17 Telegram, or Signal), contracts, and agreements.

18 **RESPONSE TO REQUEST NO. 9**

19 Respondent objects to this Request on the basis that it amounts to harassing protected  
20 whistleblower activity—including, but not limited to, identifying and divulging efforts to assist Mr.  
21 Bejar in his testimony and compliance with investigative subpoenas from governmental bodies and  
22 agencies—protected by both California Labor Code section 1102.5(b)(d) and 18 U.S.C.A. 1514A.  
23 Respondent also objects to this Request as burdensome, harassing, and violating free-speech  
24 protections of individuals in their association and assistance with his efforts in testifying and  
25 advocating against the dangers to youth posed by social media.

26 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
27 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
28 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any

1 defense or claim by Meta—nor has the connection been explained by Meta. Moreover, because the  
 2 final product of these communications—the website itself—is publicly available and speaks for itself,  
 3 Meta has not shown a justification for this added burden of production placed on Respondent through  
 4 this Request.

5 Respondent further objects that the Request is vague and ambiguous in seeking “All  
 6 Documents and Communications related to the development of <https://www.arturobejar.org/> insofar  
 7 as the Documents and Communications also relate to the use of Social Media Platforms by, safety of,  
 8 or the sexual exploitation of persons under the age of 18.” Respondent further objects that this Request  
 9 is overbroad and unduly burdensome in that it is not limited in time.

#### 10 **REQUEST NO. 10**

11 All Documents and Communications between You and Frances Haugen, Vaishnavi Jayakumar  
 12 (aka “Vaishnavi J”), Kang-Xing Jin (aka “KX Jin” or “Robert Jin”), Samir Patel, Margaret Gould  
 13 Stewart, and Alison Lee concerning Social Media Platforms and the mental, social, emotional, or  
 14 behavioral health, safety, or the sexual exploitation of persons under the age of 18.

#### 15 **RESPONSE TO REQUEST NO. 10**

16 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
 17 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
 18 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
 19 defense or claim by Meta—nor has the connection been explained by Meta.

20 Respondent objects to this Request on the basis that it amounts to harassing protected  
 21 whistleblower activity—including, but not limited to, identifying and divulging efforts to assist Mr.  
 22 Bejar in his testimony and compliance with investigative subpoenas from governmental bodies and  
 23 agencies—protected by both California Labor Code section 1102.5(b)(d) and 18 U.S.C.A. 1514A.  
 24 Respondent also objects to this Request as burdensome, harassing, and violating free-speech  
 25 protections of individuals in their association and assistance with his efforts in testifying and  
 26 advocating against the dangers to youth posed by social media.

27 Respondent further objects that the Request is vague and ambiguous in seeking documents and  
 28 communications “concerning Social Media Platforms and the mental, social, emotional, or behavioral

1 health, safety, or the sexual exploitation of persons under the age of 18.” Respondent further objects  
2 that this Request is overbroad and unduly burdensome in that it is not limited in time.

3 **REQUEST NO. 11**

4 All Documents and Communications concerning research or analyses related to the use of  
5 Social Media Platforms by, safety of, or the sexual exploitation of persons under the age of 18 and the  
6 potential benefits and alleged harms created by the use of Social Media Platforms.

7 **RESPONSE TO REQUEST NO. 11**

8 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
9 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
10 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
11 defense or claim by Meta—nor has the connection been explained by Meta.

12 Respondent further objects that the Request is vague and ambiguous in seeking documents and  
13 communications “concerning research or analyses related to the use of Social Media Platforms by,  
14 safety of, or the sexual exploitation of persons under the age of 18 and the potential benefits and  
15 alleged harms created by the use of Social Media Platforms.” Respondent further objects that this  
16 Request is overbroad and unduly burdensome in that it is not limited in time.

17 Subject to these objections, Respondent will produce nonprivileged, research or analysis  
18 performed or published by Mr. Bejar.

19 **REQUEST NO. 12**

20 All Documents received from and Communications with parties, lawyers, or any individuals  
21 working on their behalf that are engaged in litigation against or investigations of Social Media  
22 Platforms, including but not limited to Communications with: Motley Rice, LLP; Seeger Weiss, LLP;  
23 Lieff Cabraser Heimann & Bernstein, LLP; Morgan & Morgan; and the offices of various State  
24 Attorneys General, Including but not limited to the offices in California, Massachusetts, Vermont,  
25 Nebraska, New Mexico, Nevada, and Tennessee, among others.

26 **RESPONSE TO REQUEST NO. 12**

27 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
28 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from

1 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
2 defense or claim by Meta—nor has the connection been explained by Meta.

3 Subject to these objections, Respondent will produce non-privileged documents received by or  
4 provided to Mr. Bejar by Plaintiffs’ side counsel in the current lawsuit.

5 **REQUEST NO. 13**

6 Your most current C.V.

7 **RESPONSE TO REQUEST NO. 13**

8 Respondent objects to this Request as irrelevant, unduly burdensome and not proportional to  
9 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents  
10 from a non-party to the action. Subject to this objection, Respondent will produce the most current  
11 version of his C.V.

12 **REQUEST NO. 14**

13 All Documents and Communications Relating to Your possession of Documents from Meta following  
14 the conclusion of Your work at Meta.

15 **RESPONSE TO REQUEST NO. 14**

16 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
17 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
18 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
19 defense or claim by Meta—nor has the connection been explained by Meta.

20 Respondent further objects that the Request is vague and ambiguous in seeking documents and  
21 communications “Relating to Your possession of Documents.” Respondent further objects that this  
22 Request is overbroad and unduly burdensome in that it is not limited in time.

23 Subject to these objections, Respondent will produce nonprivileged documents and  
24 communications created at Meta that are possessed by Mr. Bejar.

25 **REQUEST NO. 15**

26 All Documents in Your Possession that were created at Meta that were obtained during or  
27 following your employment at Meta that You obtained Yourself or from others. All Documents in  
28

1 Your Possession that You obtained from Meta’s systems and repositories or that others working on  
2 Your behalf obtained from Meta’s systems and repositories.

3 **RESPONSE TO REQUEST NO. 15**

4 Respondent objects to this Request as overbroad, unduly burdensome and not proportional to  
5 the needs of the case pursuant to FRCP 26(b)—particularly in the context of seeking documents from  
6 a non-party to the action. These overbroad Requests to a non-party are not clearly related to any  
7 defense or claim by Meta—nor has the connection been explained by Meta.

8 Respondent objects to this Request on the basis that it amounts to harassing protected  
9 whistleblower activity—including, but not limited to, identifying and divulging efforts to assist Mr.  
10 Bejar in his testimony and compliance with investigative subpoenas from governmental bodies and  
11 agencies—protected by both California Labor Code section 1102.5(b)(d) and 18 U.S.C.A. 1514A.  
12 Respondent also objects to this Request as burdensome, harassing, and violating free-speech  
13 protections of individuals in their association and assistance with his efforts in testifying and  
14 advocating against the dangers to youth posed by social media.

15 Respondent further objects that the Request is vague and ambiguous in seeking documents and  
16 communications “that were created at Meta that were obtained during or following your employment  
17 at Meta that You obtained Yourself or from others.... that You obtained from Meta’s systems and  
18 repositories or that others working on Your behalf obtained from Meta’s systems and repositories”  
19 Respondent further objects that this Request is overbroad and unduly burdensome in that it is not  
20 limited in time.

21 Subject to these objections, Respondent will produce nonprivileged documents and  
22 communications created at Meta that are possessed by Mr. Bejar.

1 DATED: February 28, 2025

Respectfully submitted,

2  
3 By: /s/ Michael Ward

4 MICHAEL WARD (SBN 146484)

michael.ward@bakerbotts.com

JACK R. BOOTH (SBN 347887)

jack.booth@bakerbotts.com

5 **Baker Botts LLP**

6 1001 Page Mill Road, Suite 200

Palo Alto, CA 94304

7 Phone: 650-739-7538

Fax: 650-739-7638

8 KARAN SINGH DHADIALLA (SBN 296313)

9 karan.dhadialla@bakerbotts.com

10 **BAKER BOTTS LLP**

101 California Street, Suite 3200

San Francisco, CA 94111

11 Phone: 415-291-9203

12 Fax: 415-291-6303

13 *Attorneys for Respondent ARTURO BEJAR*